

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Alfred Jordan Rushie and Megan M. Young,

Plaintiffs,

v.

Black and Gerngross, P.C., Claudia P. Black,
Jenna Elise Rushie, Elizabeth Santry, AJ
Delforge, The City of Philadelphia and John
and Jane Does 1-20,

Defendants.

Case No.: 2:20-cv-02773-MSG

**MOTION OF FOR AN INJUNCTION
PURSUANT TO THE ALL WRITS ACT 28 U.S.C. § 1651**

Defendants, Black & Gerngross, P.C., Claudia P. Black, Jenna Elise Rushie, Elizabeth Santry and AJ Delforge (collectively, the “Moving Defendants”) hereby move this Court for an order granting an injunction limiting the Plaintiffs, Alfred Jordan Rushie and Megan M. Young (“Plaintiffs”), from filing any additional pleadings in the above-captioned action without leave of court pursuant to the All Writs Act, 28 U.S.C. § 1651.

The grounds for this motion will be further set forth in briefing to be filed in accordance with a schedule agreed upon by counsel for Plaintiffs and the Moving Defendants or by order of this Court.

Dated: June 30, 2020

FOX ROTHSCHILD LLP

By: /s/ Sidney S. Liebesman
Sidney S. Liebesman (PA ID# 75945)
sliebesman@foxrothschild.com
2000 Market Street, 20th Floor
Philadelphia, Pennsylvania 19103
Telephone: (215) 299-2000
Facsimile: (215) 299-2150

*Attorneys for Defendants
Black & Gerngross, P.C., Claudia P. Black,
Jenna Elise Rushie, Elizabeth Santry and AJ
Delforge*